

**elf atochem**

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Elf Atochem North America, Inc.

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Philadelphia, PA 19103-3222

Tel.: 215.419.7000

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May 14, 1998

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Document Control Office (7407)  
Office of Pollution Prevention and Toxics  
Environmental Protection Agency  
401 M St., S.W.  
Washington, D.C. 20460

Subject: TSCA Section 8(e) Submission

**COMPANY SANITIZED**

Dear Sir/Madam:

Elf Atochem North America Inc. is submitting preliminary results of an acute inhalation study in rats to the Environmental Protection Agency (EPA) pursuant to Toxic Substances Control Act (TSCA) Section 8(e). This study provides information on a mixture of a fluorinated copolymer in hydrocarbon solvent [ ]. It does not involve effects in humans.

This letter contains information which is considered confidential business information of Elf Atochem. All confidential information is enclosed in brackets[]]. A sanitized copy of this letter is enclosed.

In this study, groups of rats were exposed to one of three batches of the mixture for four hours. For the three batches, mortality occurred in 5 out of 16 rats exposed to a nominal concentration of 21.2 mg/l, 4 out of 8 rats exposed at 20.9 mg/l and 6 out of 8 rats exposed at 21.2 mg/l.

Recent experience in humans has shown that if used in improperly ventilated areas, transient effects including dizziness, cough, throat irritation and breathing difficulty during effort may occur. These effects were reported in four persons in two incidents where European customers prepared their own spray formulations containing [ ] of the fluorinated copolymer in hydrocarbon solvents in improperly ventilated spaces.

[ ]

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TSCA 8(e) Submission

May 14, 1998

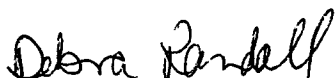
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The information on human experience and results from the studies in rats will be incorporated into the Elf Atochem Material Safety Data Sheet for the fluoropolymer material.

A copy of the full report will be forwarded to the Agency when it is received.

Further questions regarding this submission may be directed to me at (215) 419-5890.

Sincerely,

A handwritten signature in cursive script that reads "Debra Randall".

Debra Randall, DABT  
Product Safety Manager